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2 U.S. Bank Tower
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4 Los Angeles, California 90071
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6 Chapter 7 Trustee

7 UNITED STATES BANKRUPTCY COURT

8 CENTRAL DISTRICT OF CALIFORNIA

9 NORTHERN DIVISION

10 In re) Case No. 9:25-bk-10686-RC
11 TODD STUART KAPLAN,) Chapter 7
12 Debtor.)
13) NOTICE OF TRUSTEE'S INTENT
14) TO ABANDON REAL AND
) PERSONAL PROPERTY
)
) [No Hearing Required]
)
) [Local Rule 6007-1(a)]

15 TO THE HONORABLE RONALD A. CLIFFORD III, UNITED STATES
16 BANKRUPTCY JUDGE, DEBTOR, DEBTOR'S COUNSEL, ALL CREDITORS, THE
17 OFFICE OF THE UNITED STATES TRUSTEE, AND OTHER INTERESTED
18 PARTIES:

19 PLEASE TAKE NOTICE that pursuant to Section 554(a) of the
20 United States Bankruptcy Code [11 U.S.C. §554(a)], the
21 undersigned, duly appointed chapter 7 trustee ("Trustee") of the
22 bankruptcy estate (the "Estate") in the above-captioned chapter 7
23 bankruptcy case (the "Case") of debtor Todd Stuart Kaplan
24 ("Debtor"), intends to and will abandon the following described
25 real property and personal property as burdensome and of
inconsequential value to the Estate, unless, within fourteen (14)
26 days from the date of service of this Notice, a creditor or other
27 interested party files a written Objection and Request for
28

1 Hearing with the Clerk of the United States Bankruptcy Court,
2 1415 State Street, Santa Barbara, California 93101, and serves a
3 copy of such request on Trustee. Trustee intends to abandon the
4 Estate's interest in the following real property and personal
5 property scheduled by Debtor:

6 **Primary residence located at 2944 Woodflower Street, Thousand
7 Oaks, California**

8 **Stocks in MIH, Inc.**

9 **Licenses for Debtor's businesses held in Debtor's name**

10 **Money owed by MIH, Inc. to Debtor for unpaid loans**

11 and, whether scheduled or unscheduled:

12 **Appellate rights related to litigation known as *Shulman v. Kaplan***

13 If no Objection and Request for Hearing is timely filed and
14 served, Trustee may take the proposed action and Trustee will be
15 deemed to have abandoned any interest in the real and personal
16 property fourteen (14) days from the date of mailing of this
17 Notice, which date is noted in the attached proof of service.

18 DATED: December 26, 2025

19

20 /s/ Nancy Hoffmeier Zamora
21 Nancy Hoffmeier Zamora
Chapter 7 Trustee

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

U.S. Bank Tower, 633 West 5th Street, Suite 2600, Los Angeles, CA 9007

A true and correct copy of the foregoing document entitled (specify):

NOTICE OF TRUSTEE'S INTENT TO ABANDON PERSONAL PROPERTY

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On December 30, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee: United States Trustee, ustpregion16.wh.ecf@usdoj.gov

Trustee: Nancy J. Zamora, zamora3@aol.com, nzamora@ecf.axosfs.com

Trustee's Counsel: Toan B. Chung, tbchung@rpmlaw.com, toan.b.chung@gmail.com, bankpara@rpmlaw.com, brenfro@rpmlaw.com

Debtor's Counsel: Dane W. Exnowski, dane.exnowski@mccalla.com, bk.ca@mccalla.com, mccallaecf@ecf.courtdrive.com

Creditors' Counsel: Paul A Beck, pab@pablaw.org, raychael@pablaw.org, Peter T. Steinberg, mraloha@sbcglobal.net

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On December 30, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor: Todd Stuart Kaplan, 2944 Woodflower Street, Thousand Oaks, CA 91362

U.S Trustee: Office of the United States Trustee, 915 Wilshire Blvd., Suite 1850, Los Angeles, CA 90017

Judge: Judge's copy waived per Judge's procedures

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on December 30, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 30, 2025
Date

Cynthia Casas
Printed Name

/s/ Cynthia Casas
Signature

Case 9:25-bk-10686-RC

Central District of California

Santa Barbara

Tue Dec 30 00:34:36 PST 2025

Roquemore, Pringle & Moore, Inc.

13300 Crossroads Parkway North

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City of Industry, CA 91746-3404

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5150 Hollywood, LLC Main Document Page 4 of 6

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c/o Paul A. Beck Attorney

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Elizabeth Diane Donen

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Elizabeth Diane Donen

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Attn: John D. Van Ackeren

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PO Box 60519

City of Industry, CA 91716-0519

Capital One Venture

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City of Industry, CA 91716-0519

Capital One, N.A., successor by merger to Di

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1500 Centre Parkway, Suite 100

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(p)FIRST NATIONAL BANK OF OMAHA

1601 DODGE ST

STOP CODE 3113

OMAHA NE 68102-1637

Case 9:25-bk-10686-RC

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Francine Shulman and Iron Angel,
LLC; 3F, Inc.; and Emerald Sky, LLC
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Francine Shulman, Individually, f/a/s

Trustee of The Shulman Family Trust

c/o Sterline Andrew Marchand

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Resurgent Capital Services
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Wells Fargo Home Mortgage
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Wells Fargo Visa
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Sioux Falls, SD 57117-5511

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Todd Stuart Kaplan
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Thousand Oaks, CA 91362-1172

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PO Box 2557
Omaha, NE 68103-2557

(d)First National Bank of Omaha
Main Document Page 6 of 6
1601 Dodge stop code 3113
Omaha, Nebraska 68197-3113

Lighthouse
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Seattle, WA 98101

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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(u)Coleman; DeFazio; Inland Dev. Strategies,

(d)Wells Fargo Bank, N.A.
PO Box 10438, MAC F8235-02F
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